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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE LARRY A. BURNS)

UNITED STATES OF AMERICA, Plaintiff, v. **PAULINO HERRERA-HERNANDEZ,** Defendant.	**Case No. 14-cr-3571-LAB** **DATE: January 26, 2015** **TIME: 2:00 p.m.** **DEFENDANT'S NOTICE OF MOTIONS AND MOTIONS TO:** **1) COMPEL DISCOVERY;** **2) PRESERVE EVIDENCE; AND** **3) GRANT LEAVE TO FILE FURTHER MOTIONS**

The defendant, Paulino Herrera-Hernandez, by and through counsel, Amrutha N. Jindal, and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure and all other applicable statutes, case law and local rules, hereby moves this court for an order to:

1) Compel Discovery;
2) Preserve Evidence; and
3) Grant Leave to File Further Motions.

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These motions are based upon the instant pleadings, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

DATED: January 15, 2015

s/ Amrutha N. Jindal
AMRUTHA N. JINDAL
Federal Defenders of San Diego, Inc.
Attorneys for Paulino Herrera-Hernandez